

UNITED STATES District Court
for the Western District of New York

UNITED STATES OF AMERICA

V.

CASE NO.

16-MJ-4073

TONY IVEY,
DEFENDANT

MOTION TO DISMISS falsification of
CRIMINAL COMPLAINT, whereby shall DISMISS
INDICTMENT dated JUNE 28th, 2016. Falsely CHARGING
DEFENDANT HEREIN MENTIONED WITH (THREATING TO
KILL A FEDERAL PROSECUTOR) VIOLATION: TITLE 18,
UNITED STATES CODE, SECTION 115 (A)(1)(B)(1 COUNT).

UNITED STATES MARSHAL'S SERVICE, PROTECTIVE
INTELLIGENCE INVESTIGATOR ABHAY DAVE,

DELIBERATELY, KNOWINGLY AND INTENTIONALLY FALSIFIED
"PAGE #1 OF 4"

A United States Affidavit in Support of a Criminal Complaint. In paragraph #6, in part, of the Alleged Criminal Complaint, USM Abhay Dave, Senior Inspector, falsely stated that defendant herein, 'stated to the AUSA that he was going to go to the AUSA's office with an assault weapon and shoot people.'

Allow the Record to Reflect upon the three (3) taped recorded conversations that Federal Public Defender Robert Smith, has allowed this defendant to listen to and not once do this defendant make any one direct threat to any official nor any individual specifically and merely rambles on in a ingeneral abusive

MANNER, WHICH THE DEFENDANT ACKNOWLEDGES WERE NOT THE BEST COMMUNICATION SKILLS TO ADDRESS A CIVIL RIGHTS COMPLAINT ISSUE. MY, TONY L. IVEY, SINCERE APOLOGIES TO THE ALISA AND TO THE FEDERAL COURT FOR THE WESTERN DISTRICT OF NEW YORK.

NEVERTHELESS, I FIND FEDERAL PUBLIC DEFENDER ROBERT G. SMITH, TO BE INEFFECTIVELY DELIBERATELY, KNOWING AND INTELLIGENTLY CONSPIRING WITH USM ABHAY DAVE, SENIOR INSPECTOR AND OTHER UNITED STATES ATTORNEY'S INVOLVED IN THIS PRESENT CASE.

Motion for New Court Appointed Lawyer who will communicate with me and file motions

ON MY, DEFENDANT TONY IREY, BEHALF AND BEST
INTEREST. CONSIDERING THE DEFENDANT IS THE
FALSELY CHARGED DEFENDANT THATS IN A OHIO
CORRECTIONAL CENTER BEING DELIBERATELY DEPRIVED OF ALL
LUPUS MEDICATIONS, ADEQUATE MEDICAL TREATMENT AND
ON A "HUNGER STRIKE TO GET BETTER MEDICAL SERVICES
AND ALL OF NECESSARILY REQUIRED MEDICATIONS AND/OR
SENT TO A MEDICAL FACILITY."

DATED:
August 12th, 2016.

Sincerely,
Tony L. Ireay
#26889055

CC: SEND TO:

HON. FRANK P. GERACI, JR., Chief Judge

Loretta E. Lynch, Attorney General
Kiesha S. Ireay, 227 Depew St., Rochester, N.Y. 14611
NEW YORK STATE INSPECTOR GENERAL

Rosemary Speed, 15 Westland Pkwy, Cheektowaga, N.Y. 14225